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**LAW DEPARTMENT**  
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August 14, 2008

**BY FACSIMILE**

Honorable Loretta A. Preska  
United States District Judge  
United States Courthouse  
500 Pearl Street, Room 1320  
New York, New York 10007

Re: Kaur v. NYC Health and Hospitals Corporation  
07 Civ. 6175 (LAP) (MHD)

Dear Judge Preska:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel for the City of New York, and write on behalf of defendant New York City Health and Hospitals Corporation to request a sixty (60) day enlargement of time, from August 29, 2008 to October 28, 2008 within which factual discovery may be completed. The reason for this request is that I have recently been assigned to a case scheduled for trial commencing on September 8, 2008, Shapiro v. New York City Dep't of Education et al., 06 Civ. 1836 (JSR). The eight plaintiff trial is anticipated to last for three weeks. This is the parties' first request for an extension of time to complete factual discovery. Walker G. Harman, Jr., attorney for plaintiff has consented to this extension.

The City Defendant therefore respectfully requests an extension of time to

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October 28, 2008 for completion of factual discovery.


Thank you for your consideration of this request.

SO ORDERED

  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

August 14, 2008

Sincerely yours,

  
Christopher L. Heer (CH 1086)  
Assistant Corporation Counsel

cc: Walker G. Harman, Esq. (by Fax)  
(212) 971-0417